

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AUBRY MCMAHON,

Plaintiff,

vs.

WORLD VISION, INC.

Defendant.

CASE NO. 2:21-CV-00920-JLR

DECLARATION OF
MELANIE FREIBERG

Melanie Freiberg declares:

1. I have personal knowledge of the facts stated in this Declaration and am competent to testify to those facts.

2. I am the Senior Director of Talent Management at World Vision, Inc. ("World Vision" or "WV") and have been so employed since May 29, 2018.

3. As such, I am personally familiar with all documents and media referenced in this Declaration, all of which were provided to Plaintiff during discovery and bear a "WV____" citation number (or in the few cases of Plaintiff's production, a

1 “P___” citation number). I attest to the authenticity and accuracy of these documents
2 and media at appropriate places throughout this Declaration.

3
4 4. My responsibilities at World Vision include overseeing two teams:
5 Talent Acquisition (recruiters) and Human Resource (HR) Business Partners (advisers
6 to World Vision’s internal divisions). I report directly to the Senior Vice President of
7 HR at World Vision.

8
9 5. Among other things, I guide and supervise the hiring process for various
10 divisions at World Vision, including for Donor Contact Services (“DCS”). DCS also can
11 refer to “Donor/Customer Service,” as is typical in our offer letters to DCS job
12 candidates. As used in this Declaration, “DCSR” means a DCS Representative (or a
13 “DSRT” while in Training). All these titles refer to the same role and career path at
14 World Vision.

15
16 6. When issues surface during the hiring process, those issues generally
17 escalate to me. So I am familiar with the issues surrounding the rescission of the job
18 offer to Plaintiff Aubry McMahon in January 2021.

19
20 7. Ms. McMahon’s application process began in late 2020. Attached to this
21 Declaration as Exhibit MF-01 is a true and correct copy of the Worldvision.org Careers
22 Page on our web site in effect during that period (WV0045-0047), which includes,
23 among other things, (a) our expectations of wholehearted agreement with our
24 Christian faith and (b) our Equal Employment Opportunity statement. Also attached
25 to this Declaration as Exhibit MF-02 are true and correct copies of documents related
26 to this application process (P0001-08; P0079).
27

1 8. On January 5, 2021, World Vision extended to her a written offer of at-
2 will employment for the role of “DSR Trainee,” “dependent upon successful
3 completion of the training and evaluation program (predicted to be between 9 and 11
4 weeks).” Offer Letter (WV0078-0079; P0009-10). Attached to this Declaration as Exhibit
5 MF-03 is a true and correct copy of this Offer Letter to Aubry McMahon dated January
6 5, 2021 (WV0078-0079; P0009-10).
7

8 9. Also on January 5, 2021, Ms. McMahon emailed a recruiter whom I
9 supervise (Catherine Miolla), noting that Ms. McMahon and her wife were having a
10 baby. Attached to this Declaration as Exhibit MF-04 is a true and correct copy of this
11 email from Aubry McMahon dated January 5, 2021 (WV0080; P0080-81).
12

13 10. Catherine properly brought this communication from Ms. McMahon to
14 my attention because it indicated potential noncompliance with World Vision’s
15 Standards of Conduct and related policies surrounding World Vision’s deeply held
16 religious conviction that sexual conduct should not be outside of marriage and that
17 marriage is a Biblical covenant between a man and a woman. In World Vision’s view,
18 the Biblical covenant of marriage between a man and a woman is the only form of
19 marriage approved by God in His Word (the Bible) and thus the only approved place
20 for the sexual expression of human love. These Biblical views of marriage and
21 sexuality, as held by World Vision, are explained carefully later in this Declaration.
22
23

24 11. The January 5, 2021 email from Ms. McMahon conflicted with her
25 previous representations that she could and would comply with this standard of
26 conduct about marriage and sexual conduct. See DSRT Phone Screening (WV0067-
27

1 0070). Attached to this Declaration as Exhibit MF-05 is a true and correct copy of this
2 DSRT Phone Screening (WV0067-0070). Given Ms. McMahon's responses to this Phone
3 Screening, her January 5, 2021 email indicating a same-sex marriage was unexpected.
4

5 12. On January 8, 2021, after several attempts by World Vision to discuss this
6 matter further with Ms. McMahon, World Vision decided to rescind its offer to Ms.
7 McMahon. Attached to this Declaration as Exhibit MF-06 are true and correct copies
8 of these emails (WV0081-0082; P0080-81).
9

10 13. Later that day (January 8, 2021), Ms. McMahon indicated in a phone call
11 with me and Catherine that she (Ms. McMahon) was in fact in a same-sex marriage but
12 should not be disqualified for the job. See the contemporaneous Notes of 1/8/2021 call
13 (WV4697). Attached to this Declaration as Exhibit MF-07 is a true and correct copy of
14 those Notes (WV4697). I later learned from the materials provided by Ms. McMahon
15 in this lawsuit that she possessed a recording of a short excerpt from this call. A copy
16 of this recording as provided by Ms. McMahon is being filed with this Declaration as
17 Exhibit MF-08.
18

19 14. In April 2021, Ms. McMahon filed a claim with the EEOC. In July 2021,
20 Ms. McMahon filed this lawsuit.
21

22 15. On February 16, 2023, I testified by deposition as a fact witness, as called
23 by Ms. McMahon. On March 10, 2023, I testified by deposition as the Rule 30(b)(6)
24 designee on behalf of World Vision.
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1 16. In preparation for my 30(b)(6) deposition, I studied and reviewed many
2 corporate and organizational materials of World Vision (many of which I was already
3 familiar with), including materials that I am authenticating in this Declaration.
4

5 17. Following now is a short summary of World Vision and then various
6 materials that I will explain and authenticate.

7 18. World Vision was founded in 1950 by Robert Pierce as a Christian
8 ministry dedicated to sharing the gospel of Jesus Christ, primarily through
9 humanitarian outreach to children and families around the world who are poor and
10 underserved. It operates in many ways like a Christian church and implements its
11 programs through and as supported by local churches in the United States and around
12 the world.
13

14 19. Under its Articles of Incorporation, “[t]he primary, exclusive and only
15 purposes for which this corporation is organized are religious ones, to wit: To perform
16 the functions of the Christian church including, without limitation, the following
17 functions[:] to conduct Christian religious and missionary services, to disseminate,
18 teach and preach the Gospel and teachings of Jesus Christ, to encourage and aid the
19 growth, [nurture] and spread of the Christian religion and to render Christian service,
20 both material and spiritual to the sick, the aged, the homeless and the needy. The
21 recital of these purposes as contained in this paragraph is intended to be exclusive of
22 any and all other purposes, this corporation being formed for such religious purposes
23 only.” Articles of Incorporation, as Amended, at WV0017-18. See also WV0012
24 (paragraph “Second”). Attached to this Declaration as Exhibit MF-09 is a true and
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1 correct copy of World Vision's Article of Incorporation, as Amended (WV0001-20).
2 This same "Purpose" provision is included in World Vision's Bylaws.

3 20. The Articles of Incorporation also require World Vision "[t]o continually
4 and steadfastly uphold and maintain the following statement of faith of this
5 corporation, to wit: (a) We believe the Bible to be the inspired, the only infallible,
6 authoritative Word of God; (b) We believe that there is one God, eternally existent in
7 three persons: Father, Son, and Holy Spirit; (c) We believe in the deity of our Lord Jesus
8 Christ, in His virgin birth, in His sinless life, in His miracles, in His vicarious and
9 atoning death through His shed blood, in His bodily resurrection, in His ascension to
10 the right hand of the Father, and in His personal return in power and glory; (d) We
11 believe that for the salvation of lost and sinful man regeneration by the Holy Spirit is
12 absolutely essential; (e) We believe in the present ministry of the Holy Spirit by whose
13 indwelling the Christian is enabled to live a godly life; (f) We believe in the resurrection
14 of both the saved and the lost; they that are saved unto the resurrection of life and they
15 that are lost unto the resurrection of damnation. We believe in the spiritual unity of
16 believers in our Lord Jesus Christ." Exhibit MF-09, Articles of Incorporation at 6-7
17 (WV0007-0008). See also Articles of Amendment at 2 (WV0013). This Statement of
18 Faith is posted to our website (<https://www.worldvision.org/statement-of-faith>) as
19 is the Apostles' Creed (<https://www.worldvision.org/the-apostles-creed>).

20 21. Immediately following the above Statement of Faith is this requirement:
21 "That the aforesaid doctrinal statement is the basic Spiritual foundation for this
22 corporation, and the same shall not be amended, or deleted from these Articles of
23

1 Incorporation except by vote or written consent of all of the members.” Exhibit MF-09,
2 Articles of Incorporation at 7 (WV0008).

3 22. The above stated religious beliefs of World Vision reflect its ultimate
4 foundation as a Christian ministry. Everything else World Vision does or aspires to do
5 is built on this foundation. It is the reason and guidance for World Vision’s ministry.
6

7 23. The Job Posting for the position that Ms. McMahon sought at World
8 Vision reflects this spiritual foundation. That Job Posting required her to “Personify
9 the ministry of World Vision by witnessing to Christ and ministering to others through
10 life, deed, word and sign [and k]eep Christ central in our individual and corporate
11 lives.” Attached to this Declaration as Exhibit MF-10 is a true and correct copy of this
12 Job Posting, 2020 (P0011-20; P0072-77; WV0048-0050). Our individual and corporate
13 “witness to Jesus Christ” is vital to World Vision, as discussed further below.
14

15 24. Ms. McMahon brought this lawsuit to dispute World Vision’s hiring
16 rights. This is not the first time World Vision faced litigation over its hiring rights. In
17 *Spencer v. World Vision*, former employees sued World Vision in this same court in
18 litigation that lasted from about 2007 to 2011. I have reviewed factual statements about
19 World Vision, its Christian beliefs, its policies and requirements for employees, and
20 similar factual matters from the court opinions in that litigation to verify whether they
21 remain true and accurate statements about World Vision.
22

23 25. I confirm that the following statements of fact (in this paragraph), taken
24 from the court opinions in the *Spencer v. World Vision* litigation, have remained true at
25 all times of my World Vision tenure: World Vision’s “overt Christianity is especially
26
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1 evident to" job seekers because it permeates the World Vision workplace. It does so
2 because World Vision exists "only" to "spread" its "Christian faith" as "infallibl[y]"
3 and "authoritative[ly]" established by "the Bible." This faith dwells "at the heart of
4 all" World Vision does, including its "relief efforts," which "flow from [its] profound
5 sense of religious mission." Since World Vision "believes the key" to this mission "lies
6 first in the hearts and minds of [its] staff," its workforce consists "only [of] Christians
7 for all positions." From each member of this Christian workforce, World Vision
8 requires a "commitment to [this] shared faith [and] a common understanding of how
9 that faith is lived out day-to-day."

12 26. I also confirm that the following statements of fact (in this paragraph),
13 taken from the court opinions in the *Spencer v. World Vision* litigation, have remained
14 true at all times of my World Vision tenure: All World Vision staff (including DCSRs)
15 are responsible for: (a) confessing they are committed Christians; (b) agreeing
16 "wholeheartedly" with World Vision's core religious principles; (c) "communicating
17 [World Vision's] Christian faith [and] witness," which is "integrated [into] everything
18 [it] does," "accurately and with integrity"; and (d) participating "regularly" in "prayer
19 activities, devotionals, and weekly chapel services." A core job responsibility of all staff
20 is prayer, which "is a component of [World Vision's] work." To begin each work year,
21 "an entire work day is set aside each year for prayer," which all staff must attend.

24 27. I further confirm that the statements of fact (in the succeeding
25 subparagraphs), taken from the court opinions in the *Spencer v. World Vision* litigation,
26 have remained true at all times of my World Vision tenure.
27

- 1 a. "The primary, exclusive and only purposes for which [World Vision] is
2 organized are religious ones, to wit: to perform the functions of the
3 Christian church including, without limitation, the following functions[:]
4 to conduct Christian religious and missionary services, to disseminate,
5 teach and preach the Gospel and teachings of Jesus Christ, to encourage
6 and aid the growth, [nurture,] and spread of the Christian religion[,] and
7 to render Christian service, both material and spiritual to the sick, the
8 aged, the homeless and the needy. [T]his corporation [is] formed for such
9 religious purposes only."
- 10 b. The IRS classified World Vision as a 501(c)(3) tax-exempt nonprofit
11 organization designated as a church.
- 12 c. "[P]rospective employees are informed" that "'our faith in Jesus [is] at
13 the heart of all we do,'" and "'[f]oundational to our work is the
14 commitment to a shared faith by staff [and] a common understanding of
15 how that faith is lived out day-to-day.'"
- 16 d. "[Most donations come] from churches and individuals 'who share the
17 religious vision of [World Vision].' Fundraising letters to donors contain
18 Bible verses and reference[its] Christian[ity]. [It] holds itself out to the
19 public as a religious organization. Its website, job application form,
20 mailings, instruction materials, and business cards all reference [that it
21 is] 'Christian[,] that '[its] faith [in Jesus] is at the heart of all [it does].'
22 [R]eligious art [is] displayed throughout [its] campuses and buildings.
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1 [Work life] regularly includes prayers and other forms of worship such
2 as chapel services, devotionals led by [staff], prayer chains, an annual
3 day of prayer, and Scriptural themes. [It] coordinates Christian
4 employee programming['] and] prayer is a component of [its] work. [Its]
5 membership is comprised of coreligionists; [It] hires only Christians for
6 all positions.'"

7
8 e. "Even a cursory review of World Vision's [foundational documents]
9 reveal explicit and overt references to a religious purpose. [This
10 includes] the commitment to 'continually and steadfastly uphold and
11 maintain the following statement of faith,' which begins: 'We believe
12 the Bible to be the inspired, the only infallible, authoritative Word of
13 God.'"

14
15 f. All of World Vision's core "principles are avowedly religious."

16
17 g. "World Vision ['expresses its] Christian faith accurately and with
18 integrity' [and] 'always identifies itself [as] Christian[.]' [E]mployees are
19 to ask themselves, 'Would anyone who read this know that World Vision
20 is a Christian organization?' ['Our witness is] NOT AN ADD-ON.
21 Because we demonstrate our faith through life, deed, word, and sign, our
22 Christian witness is integrated into [and] communicated as part of
23 everything [we do].'"

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25
26 h. "This overt Christianity is especially evident to those applying for
27 employment" at World Vision. Its "prospective employees [are]

1 specifically requested to describe their ‘relationship with Jesus Christ’”
2 and are “informed that employment is contingent upon” their faithfully
3 following Christ.
4

5 i. “[B]ecause it ‘believes the key to faithfully following Christ lies first in
6 the hearts and minds of [its] staff and only then in program activities,’
7 religion pervades the workplace at World Vision. New employees
8 participate in a [multi]-day orientation which begins with ... devotionals
9 and ‘focuses on serving Christ as the motivation for serving the poor.’
10 [They] are ‘strongly encouraged’ to attend weekly chapel services[;]
11 devotional activities are held [several times a week] within each
12 department; prayer requests are circulated amongst coworkers; Biblical
13 ‘themes’ are emphasized [continually]; and an entire work day is set
14 aside each year for prayer.”
15

16
17 j. World Vision’s “relief efforts flow from a profound sense of religious
18 mission [and] it explicitly and intentionally holds itself out to the public
19 as [such].”
20

21 k. World Vision’s “services are made available to people of all faiths or of
22 no faith.”
23

24 l. World Vision (i) is organized for a religious purpose, (ii) is engaged
25 primarily in carrying out that religious purpose, (iii) holds itself out to
26 the public as an entity for carrying out that religious purpose, and (iv)
27

1 does not engage primarily or substantially in the exchange of goods or
 2 services for money beyond nominal amounts.

3 28. Additional explanation and authentication of World Vision policies,
 4 expectations, and employment actions now follow.

5
 6 29. World Vision's understanding of the infallible, authoritative nature of
 7 the Bible as God's Word is embodied in the World Vision Faith in Action Study Bible
 8 (Zondervan 2005) (an illustrated Bible featuring World Vision's work as a response to
 9 Scripture) ("WV Study Bible"). This 2,315-page WV Study Bible contains many photos
 10 and marginal study notes with emphasis on topics important to World Vision. A true
 11 and correct hardbound WV Study Bible is being filed with this Declaration as Exhibit
 12 MF-11.¹ Attached to this Declaration as Exhibit MF-12 are true and correct copies of
 13 the front and back cover and sample pages from this WV Study Bible (WV2794-2804).
 14

15
 16 30. Our Job Postings require "witnessing to Christ and ministering to others
 17 through life, deed, word and sign." See, for example, Exhibit MF-10, Job Posting, 2020
 18 (P0011-20; P0072-77; WV0048-0050). For World Vision, its individual and corporate
 19 "witness" is vital to its existence. "We believe [all our] efforts are a witness to Jesus
 20 Christ through life, word, sign, and deed, and encourage individuals to respond to the
 21 gospel." Exhibit MF-11, WV Study Bible at ix.
 22

23 31. The phrase "witness to Jesus Christ," and doctrines about being a faithful
 24 witness to, for, and about Jesus Christ, appear throughout World Vision's core
 25

26
 27 ¹ Hardbound WV Study Bibles were provided to Ms. McMahon's counsel in 2022, and presumably to
 this Court during the *Spencer* litigation in 2008.

1 principles and policies. For example, our Mission Statement (WV0023) says our
2 mission as a ministry is to “Witness to Jesus Christ by life, deed, word and sign that
3 encourages people to respond to the Gospel.” Attached to this Declaration as Exhibit
4 MF-13 is a true and correct copy of this World Vision Mission Statement (WV0023).
5

6 32. World Vision also has several policies that charge the ministry and all of
7 us who carry out that ministry to maintain this Christian commitment and Christian
8 witness. The entire Christian Commitment & Witness Policy (WV0027-0030) does this.
9 Attached to this Declaration as Exhibit MF-14 is a true and correct copy of this
10 Christian Commitment & Witness Policy (“CCW Policy”) (WV0027-0030).
11

12 33. The Business Ethics and Christian Conduct Policy (“BECC Policy”)
13 (WV0031-0034) also does this. For example, the BECC Policy explains that “Effective
14 Christian witness is first expressed in the conduct of staff and how we love and share
15 a common Statement of Faith. WVUS seeks to be an organization that is ‘Christian’ in
16 every sense of the word; therefore, all staff represent WVUS and, more importantly,
17 the Gospel of Jesus Christ, in their work as well as in their private lives.” Attached to
18 this Declaration as Exhibit MF-15 is a true and correct copy of this World Vision
19 Business Ethics and Christian Conduct Policy (“BECC Policy”) (WV0031-0034).
20
21

22 34. As part of the regular onboarding and training process for DCSR
23 Trainees, World Vision requires that they expressly affirm the World Vision Statement
24 of Faith and/or Apostle’s Creed, the Business Ethics and Christian Conduct Policy
25 (“BECC Policy”), the Christian Commitment and Witness Policy (“CCW Policy”), and
26 the World Vision Standards of Conduct (“SOC”). Attached to this Declaration as
27

1 Exhibit MF-16 is a true and correct copy of this required affirmation process in effect
2 in January 2021 (WV6115-6118).

3 35. World Vision's Christian witness is so foundational to our ministry that
4 we train our staff on living it and communicating it. Just as one example, World
5 Vision's Christian Witness Messaging presentation urges World Vision's goal that
6 "Every current and potential donor and partner will clearly understand our mission
7 to bear witness to Jesus Christ—through life, deed, word, and sign—in ways that
8 encourage people to respond to the gospel of Jesus Christ." (WV1125) Attached to this
9 Declaration as Exhibit MF-17 is a true and correct copy of these WV Christian Witness
10 Messaging materials (WV1124-1141).

11 36. Indeed, as accurately described by the courts in *Spencer*, our Christian
12 "witness" is "NOT AN ADD-ON," but instead: "Because we demonstrate our faith
13 through life, deed, word, and sign, our Christian witness is integrated into [and]
14 communicated as part of everything [we do]."

15 37. Consequently, our corporate and individual behavior witnesses, reflects,
16 and testifies about what we believe as a ministry and as individual believers. That
17 behavior either honors our triune God, or it dishonors Him.

18 38. Because World Vision believes this, it seeks to honor God by requiring
19 all staff to "[f]ollow the living Christ, individually and corporately in faith and
20 conduct, publicly and privately, in accord with the teaching in His Word (the Bible)."
21 CCW Policy at 1 (WV0027).

1 39. Thus, World Vision requires that staff “behavior [be] consistent with the
2 teachings of Scripture.” BECC Policy, §2.6.6 (WV0032). Behavior that is consistent with
3 the teachings of Scripture honors and glorifies God. Behavior that is inconsistent with
4 the teachings of Scripture has the opposite effect and requires repentance.

5
6 40. Because it is “impossible ... to identify every form of behavior that we
7 understand the Bible defines as acceptable and unacceptable to God,” World Vision
8 provides Standards of Conduct to “clarify expectations and assist candidates
9 /employees in deciding whether or not WVUS is the right place for them to serve the
10 Lord.” WVUS Standards of Conduct for Employees, 1 (WV0035). Attached to this
11 Declaration as Exhibit MF-18 is a true and correct copy of Standards of Conduct for
12 Employees (“Standards of Conduct” or “SOC”) (WV0035-0039). The SOC are part of,
13 and an attachment to, the BECC Policy, Exhibit MF-15 (WV0032-0034), and are
14 included in the BECC Policy as an embedded document (WV0033). The SOC at the
15 time of *Spencer* were included in the materials that World Vision provided to the Court.
16
17

18 41. One of the forms of behavior identified by the SOC is sexual conduct.
19 World Vision understands *marriage*, which it defines as the “Biblical covenant ...
20 between a man and a woman,” SOC at 2 (WV0036), as the exclusive space for human
21 sexual conduct, i.e., the sexual expression of human love. See Christian Commitment
22 & Witness/Standards of Conduct FAQ 1(F) (WV4694). Attached to this Declaration as
23 Exhibit MF-19 is a true and correct copy of this “CCW/SOC FAQ” (WV4694-4696).
24
25

26 42. Stated another way, World Vision defines *marriage* as the “Biblical
27 covenant ... between a man and a woman,” SOC at 2 (WV0036), and in World Vision’s

1 view, the Bible confines the “express[ion of] sexuality solely within a faithful marriage
2 between a man and a woman,” CCW/SOC FAQ 1(F) (WV4694). Thus, World Vision
3 seeks to “honor this Biblical model of a monogamous heterosexual marriage.” *Id.* at
4 FAQ 3 (WV4695). This Biblical model, based on a covenant ordained by God, is a
5 matter of great importance, in World Vision’s view.
6

7 43. The above understanding or definition of World Vision of the Biblical
8 covenant of marriage may be referred to in this Declaration as its “marriage policy.”
9

10 44. For World Vision, any sexual conduct outside this “Biblical covenant,”
11 such as “being sexually active with someone other than your spouse of the opposite
12 sex,” *id.* at FAQ 3 (WV4694), is a sin and, like any other sin, requires “repentance when
13 we fail.” CCW Policy, 2.2 (WV0028). World Vision believes that “all have sinned,”
14 BECC Policy, 2.2 (WV0031), due to human sin orientation, but that Christians, when
15 they sin, must “return” to God “in repentance.” CCW Policy, 2.2 (WV0028). To World
16 Vision, same-sex marriage represents “open, ongoing, unrepentant” sexual
17 misconduct contrary to its “deeply held belief that marriage is a Biblical covenant
18 between a man and a woman.” *Do you hire LGBTQ individuals?* (WV0731). Attached to
19 this Declaration as Exhibit MF-20 is a true and correct copy of this *Do You Hire LGBTQ*
20 *Individuals?* document (WV0731).
21
22

23 45. “People of any sexual orientation can work at World Vision as long as
24 they agree with our statement of faith and abide by our conduct policy. [We hire]
25 people who live out biblical standards of conduct. We expect all employees, regardless
26 of sexual orientation, to live by these standards, outlined in our conduct policy,
27

1 including remaining celibate outside of marriage. It's our deeply held belief that
2 marriage is a Biblical covenant between a man and a woman. This is made clear to
3 people applying to work at World Vision. [O]ur stance [reflects] our interpretation of
4 Scripture." Exhibit MF-20 (WV0731). This understanding is also reflected in the
5 CCW/SOC FAQs 1-3 (WV4694-4695); in the Hiring Practices (WV2849) and Hiring
6 Practices: Employment & Sexual Orientation (WV2853); and in the World Vision
7 Christian Compatibility document (WV1390). Attached to this Declaration as Exhibit
8 MF-21 is a true and correct copy of the Hiring Practices document (WV2849-2851,
9 WV2852-2854) and attached to this Declaration as Exhibit MF-22 is a true and correct
10 copy of the WV Christian Compatibility Screening/Christian Commitment & SOC
11 (WV1389-1394).

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15 46. Out of humble obedience to God's Word, World Vision forbids "sexual
16 conduct outside the Biblical covenant of marriage between a man and a woman."
17 Exhibit MF-18, SOC #3 at p. 2 (WV0036). Board Standing Policy requires: "All staff
18 shall be required to agree to and comply with [this] policy. (John 14:15-21; I John 2:3-6
19 and 3:4-6; Galatians 5:22-25). Failure to do so may require disciplinary action or
20 termination." Board Standing Policy, §3.7.1 (WV0668). Attached to this Declaration as
21 Exhibit MF-23 is a true and correct copy of this Board Standing Policy (WV0659-0678).

22
23 47. This policy embodies World Vision's deeply held belief in the "Biblical
24 model of a monogamous heterosexual marriage." Exhibit MF-19, CCW/SOC FAQ 3
25 (WV4695). World Vision strives to apply this policy consistently, even-handedly,
26
27

1 lovingly, humbly, and, above all, faithfully to its understanding of the requirements of
2 Scripture.

3
4 48. At World Vision, this Biblical “stance” on marriage, including its
5 exclusive role for the expression of human sexuality, reflects “our interpretation of
6 Scripture.” Exhibit MF-20 (WV0731). This stance is part of our individual and
7 collective “witness to Jesus Christ.” This stance (witness) is integral to what World
8 Vision means when we charge our staff to “Personify the ministry of World Vision by
9 witnessing to Christ and ministering to others through life, deed, word and sign [and
10 k]eep Christ central in our individual and corporate lives.” Exhibit MF-10, Job Posting,
11 2020 (P0011-20; P0072-77; WV0048-0050).

12
13 49. World Vision believes that same-sex marriage contradicts its Biblical
14 policy and witness in several ways. First, entering into and living in a same-sex
15 marriage defies World Vision’s religious understanding of and policy regarding
16 Biblical marriage. Second, living openly in a same-sex marriage embodies an ongoing
17 public stance promoting such conduct. Third, a same-sex marriage indicates sexual
18 conduct that does not comply with World Vision’s religious beliefs and Standards of
19 Conduct for its employees.
20
21

22 50. Following Ms. McMahon’s January 5, 2021 email indicating her same-sex
23 marriage, Exhibit MF-04 (WV0080; P0080-0081), World Vision engaged in internal
24 discussions about the application of its Biblical marriage policy, and the Scriptural
25 truths on which it is based, to Ms. McMahon’s situation. I was involved in most of
26 these discussions, as were other managers. As Christians trying to be faithful to God
27

1 and to World Vision, we sought to apply internal religious policies, requirements, and
2 doctrine correctly and lovingly. The result of these internal deliberations was a
3 decision to rescind the job offer.
4

5 51. Our decision to rescind Ms. McMahon's offer consisted of internal
6 management-level discussions of World Vision's Biblical marriage policy, the
7 Scriptures and doctrines underlying it (such as SOC, Exhibit MF-18 (WV0035-0039)),
8 and the Biblically faithful way to apply these religious requirements for all World
9 Vision employees and for this specific position.
10

11 52. I regularly attend organization-wide chapel services and am personally
12 familiar with chapel services led by DCS and DCS team members. In the regular course
13 of business, HR archives chapels, including those that predate my employment at WV.
14 I viewed video recordings of the DCS-led chapel services on June 11, 2008, September
15 1, 2010, January 22, 2013, June 26, 2019, and August 4, 2021. True and correct video
16 recordings of these five DCS-led organization-wide chapel services are being filed with
17 this Declaration as Exhibits MF-24, MF-25, MF-26, MF-27, and MF-28.
18
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20 53. World Vision's key foundational and operational documents reflect its
21 religious character and purpose. World Vision includes its mission, vision, and core
22 values in the "Orange Book: Living Out Our Values," an employee guidebook. World
23 Vision's Mission Statement is "to follow our Lord and Savior Jesus Christ in working
24 with the poor and oppressed to promote human transformation, seek justice, and bear
25 witness to the good news of the kingdom of God." Orange Book at 4 (WV0711). This
26 Orange Book is made available to all World Vision employees during their initial
27

1 onboarding or training, and remains available to all employees, to help them better
2 understand, comply with, and carry out World Vision's mission, vision, and core
3 values. Attached to this Declaration as Exhibit MF-29 is a true and correct copy of this
4 World Vision Orange Book: Living Out Our Values (WV0708-0730).

5
6 54. World Vision trains our staff, including DCSRs, about World Vision's
7 Christian mission, vision, core values, and statement of faith, and their Scriptural
8 foundations, through a number of training programs and materials, such as the
9 Mission Immersion Program. Attached to this Declaration as Exhibit MF-30 are true
10 and correct copies of some Mission Immersion Program materials (WV6129-6157).

11
12 55. Some examples of World Vision's commitment to prayer by its staff,
13 including DCSRs, include the following: the real-time invitation to prayer—"How can
14 we pray for you?"—on the World Vision Facebook page (WV5244); the *Hope Over Fear*
15 prayer chain that World Vision began in 2020 for staff to pray in a focused regular way
16 for prayer requests specifically elicited from or requested by donors and others
17 through calls from DCSRs (WV3114-3119, 4845, 4931-4934, 6063); the *Keys to a More*
18 *Powerful Prayer Life* resources for staff (WV3509-3516); and the *Devotion Guidelines* to
19 guide staff in leading and participating in the regular devotions that each World Vision
20 department (including DCS) gathers for several times each week (WV2813-2815).
21 Attached to this Declaration as Exhibit MF-31 are true and correct copies of these
22 prayer-related materials.

23
24 56. Some examples of World Vision's Christian spiritual formation of its
25 staff include the *Living Out Our Faith at Work* materials that World Vision provides to
26
27

1 guide staff in how to live out their faith and be committed to Christian conduct
 2 throughout their lives (WV2829-2830); the *Making a difference-We are World Vision*
 3 devotional materials for staff (WV5258-5263); and the *Vision Conversation* resources for
 4 staff spiritual formation (WV6065-6070). Attached to this Declaration as Exhibit MF-32
 5 are true and correct copies of these spiritual formation and Christian commitment
 6 materials for staff.
 7

8 57. Additional examples of World Vision's Christian spiritual formation of
 9 its staff include the *Believe Belong Become* program and resources to create a thriving,
 10 Christ-centered employee experience that reinvigorates its employees to be committed
 11 to World Vision's Christ-centered mission and to fulfilling it with the donors and
 12 children World Vision serves, to witness to Christ, to belong to World Vision's diverse
 13 community of Christian believers, and to fulfill World Vision's mission. Attached to
 14 this Declaration as Exhibit MF-33 are true and correct copies of these *Believe Belong*
 15 *Become* materials (WV6016-6044).
 16

17 58. Additional examples of World Vision's Christian spiritual formation of
 18 its staff include the *Witness to Jesus Christ Council* (or "W2JCC") resources to support
 19 their spiritual nurture. Attached to this Declaration as Exhibit MF-34 are true and
 20 correct copies of these *Witness to Jesus Christ Council* materials (WV6077-6086).
 21

22 59. The deep Christian commitment of World Vision and its staff is also
 23 evident in the many forms of Christian religious artwork displayed throughout World
 24 Vision's offices, as the court noted in the *Spencer* case. Attached to this Declaration as
 25
 26
 27

1 Exhibit MF-35 are true and correct copies of some of this religious artwork (WV3120-
2 3162).

3
4 60. A short list of examples of religious programming and training at World
5 Vision includes: (a) New Employee Orientation: Living Out Our Faith @ Work; (b)
6 Faith At Work (Faith@Work) program; (c) Mission Immersion Program; (d)
7 Management Essentials Training ("MET"): Spiritual Leadership & Spiritual Nurture
8 of Staff; (e) MET1: Becoming a Spiritual Leadership; (f) MET2: Spiritually Leading your
9 Teams; (g) Witness to Jesus Christ Council; (h) Believe Belong Become; (i) Annual Day
10 of Prayer; (j) Prayer Masters: Learning to Pray; (k) Hope Over Fear Prayer Chain; (l)
11 Weekly Chapel (organization-wide); (m) Devotions (department-wide, several times
12 per week); and (n) How To Lead a Devotion.
13
14

15 61. World Vision does not charge beneficiaries for any of its goods or
16 services.
17

18 ***** Signature Page Follows *****
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1 I declare under penalty of perjury under the laws of the State of Washington
2 that the foregoing is true and correct.
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5 SIGNED this 10 day of April, 2023, at Auburn, Washington.
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9 MELANIE FREIBERG
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